



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8EPR-N

Gary Torres  
Bureau of Land Management  
Monticello Field Office RMP Comments  
365 N. Main  
Monticello, Utah 84535

RE: Final Resource Management Plan and  
Environmental Impact Statement for the  
Monticello Field Office Planning Area  
CEQ#: 20080339

Dear Mr. Torres:

Consistent with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Final Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Bureau of Land Management's (BLM) Monticello Field Office Planning Area (Monticello PA). The Monticello PA comprises approximately 4.5 million acres of land, including approximately 2.5 million acres of mineral estate and 1.8 million acres of public land administered by the BLM. This area includes the southern two-thirds of San Juan County and a small portion of southern Grand County in southeastern Utah.

This RMP will revise and replace the 1991 San Juan Resource Area RMP. The RMP revision will provide long-term management direction to BLM on planning issues including: recreation and travel, minerals, special designations such as Areas of Critical Environmental Concern (ACECs), non-Wilderness Study Areas (WSAs) lands with wilderness characteristics, visual resources, and cultural resources. The Proposed RMP/Final EIS (Proposed Plan) consists of a combination of proposed decisions from the full range of alternatives presented in the Draft RMP/Draft EIS. The Proposed Plan is most closely associated with Alternative C, which was the Preferred Alternative in the Draft RMP/EIS. The Proposed Plan was developed based on public comments on the Draft RMP/EIS, coordination with the Cooperating Agencies, and internal review and comment.

Our comments on the Draft RMP/EIS identified general and specific concerns associated with recreation and travel management including off-highway vehicle (OHV) use, special designations including ACECs, protection of visual and cultural resources, management of non-WSA lands with wilderness characteristics, and air quality. EPA's primary concerns were: the lack of information provided in BLM's analysis of air quality impacts from various sources in the MPA including oil and gas development; 2) the environmental impacts resulting from OHV travel and other recreational uses of BLM lands; 3) and the environmental impacts resulting from a proposed overall reduction in Visual Resource Management (VRM) Class I and II designated landscape acreage.

In general, EPA finds the FEIS largely responsive to our concerns. We commend BLM for changes made in the Preferred Alternative that are more protective of environmental resources. EPA supports the addition of two Special Recreation Management Areas (SRMAs) in the Proposed Plan, adding acreage that exceeds the Preferred Alternative yet is still 51,666 acres less than the No Action alternative/existing management. EPA also supports the increase in miles of eligible river segments from 18.4 miles in the Preferred Alternative to 35.7 miles, and the increase in suitable segments proposed in the Proposed Plan.

EPA notes there is a slight decrease in Areas of Critical Environmental Concern (ACECs) acreage between the Preferred Alternative and the Proposed Plan, and Wilderness Study Areas would remain the same with 13 WSA's on 391,599 acres. However, the Proposed Plan includes an increase from 0 acres to 88,871 acres of non-Wilderness Study Area lands with wilderness characteristics that would be managed to protect, preserve and maintain their wilderness characteristics. EPA believes these additional protections will allow BLM to more effectively mitigate ongoing and future impacts to cultural, riparian, visual and soil resources, vegetation, rare plant and animal species, and other unique and valuable resources within the MPA.

In terms of Oil and Gas Leasing Stipulations, EPA finds the Proposed Plan has increased protections as well. Compared with the Preferred Alternative, the Proposed Plan increases timing limitations and controlled surface use from 719,501 acres to 940,594 acres. No Surface Occupancy also increases from 39,323 acres (Preferred Alternative) to 66,108 acres, and closed areas increase from 395,329 acres (Preferred Alternative) to 493,400 acres under the Proposed Plan. As noted in the document, areas identified as closed would not be available for oil and gas leasing.

### **Air Quality**

For the Monticello RMP Final EIS, BLM presented a qualitative estimate of total emissions for selected pollutants. The primary future additions to air pollutant emissions are expected to originate from the reasonably foreseeable development of approximately 54-75 natural gas wells over the next 15 years on public lands within the Monticello Field Office planning area. The air impact analysis was conducted using a qualitative analysis comparison against existing emissions from the Monticello surrounding areas. EPA is concerned that the results of this qualitative air quality analysis omit criteria pollutant and visibility impacts to the



surrounding area. The planning area encompasses the Class I area of Canyonlands National Park and is adjacent to Capital Reef, Arches and Mesa Verde National Parks, which all receive special protection of air-quality related values.

EPA recognizes that the oil and gas development occurring in the Monticello planning area may be approved by BLM via categorical exclusions without the full analysis of potential air quality impacts and consideration of appropriate mitigation measures. Section 390 of the Energy Policy Act of 2005 established five categorical exclusions under NEPA including an exclusion for "Drilling an oil and gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as reasonably foreseeable activity, so long as such plan or document was approved within five years prior to the date of spudding the well." EPA is concerned that the air quality qualitative emissions comparison conducted in the Monticello RMP Final EIS may be insufficient to provide BLM with the information necessary to issue categorical exclusions while still being protective of air quality in central Utah. Given the potential for categorical exclusions, EPA urges BLM to complete air quality modeling for future projects and to implement mitigation measures to be incorporated into the Monticello RMP Record of Decision (ROD).

Consistent with our comments on the Draft RMP/EIS, EPA recommends that the Monticello RMP/FEIS ROD contain a commitment similar to the following excerpt from the Rawlins, Wyoming Draft RMP/EIS, which also used a comparative, emissions-based approach: *"As project-specific developments are proposed, quantitative air quality analysis would be conducted for project-specific assessments performed pursuant to NEPA."*

### **Travel/Recreation Management**

EPA strongly supports BLM's decision to eliminate cross-country, off-highway vehicle (OHV) use on the entire Monticello PA, when the Preferred Alternative proposed allowing that use on 2,311 acres. This will allow areas which are experiencing environmental impacts including noise and air pollution from exhaust emissions, water quality impacts from erosion and sedimentation, loss of listed and sensitive wildlife and riparian habitat, and loss of cultural resources due to looting and vandalism to recover and restore ecosystem health. Where OHV use is allowed on designated routes, EPA remains concerned about impacts from that use and associated activities like unrestricted camping, the lack of enforcement against bad actors and resources to improve user compliance. EPA is also concerned that that number of acres closed to OHVs has been reduced from 418,667 acres in the Draft EIS Preferred Alternative to 393,895 acres in the Proposed Plan.

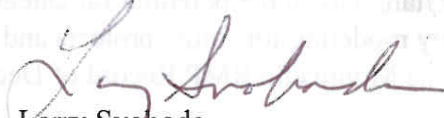
### **Visual Resource Management**

BLM manages a considerable amount of landscape of outstanding scenic quality (e.g., Lockhart Basin) which is serving an increasingly important role in local communities' growing service-based economies within the MPA. EPA remains concerned with BLM's proposal to significantly reduce the overall amount of landscape acreage under VRM Class I/II designation in Alternative C. This would allow for significantly more moderate to major surface disturbances,

some of which would visually dominate the MPA's internationally-recognized natural landscape. We also believe this would result in a higher occurrence of environmental impacts to a number of other important resources including vulnerable (e.g., reclamation-limited) soils, vegetation, cultural sites, and riparian areas. We continue to recommend that BLM retain most or all of its VRM Class I/II landscape within the MPA consistent with its Visual Resource Inventory (VRI).

Overall, EPA recognizes the complexity and diversity of the proposed resource management actions and commends BLM's comprehensive analysis and disclosure of the proposed RMP plan. We expect that planning issues discussed in our comments will continue to be among those monitored as the plan is implemented. If you would like to discuss these comments, or any other issues related to our review of the Final RMP/EIS, please contact Jody Ostendorf at 303-312-7814. Thank you for the opportunity to comment.

Sincerely,



Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation

Enclosures

